



EPA's National Organic Program Guidance December 20, 2007

- The National Organic Program (NOP) is a USDA program. All matters of policy concerning the eligibility of Inert Ingredients for use in the NOP are determined by USDA. EPA's role is to assist USDA by assuring that USDA's policies are implemented with regard to organic claims made by registered pesticide products.
- USDA policy regarding Inert Ingredients and List 4 is summarized in the following USDA document: [Instructions to Certifiers for Use of EPA List 4 Inert Ingredients](#)
- If an applicant has questions with regard to the policy outlined in the above link, or wishes to petition USDA for the addition of another Inert Ingredient, EPA refers the applicant to USDA's NOP office. Program and contact information can be found through the following link: <http://www.ams.usda.gov/nop/indexIE.htm>
- Per USDA, any applicants seeking organic designation must assure that their inert ingredients can be found on this posted List 4, dated August 2004. No other Inert Ingredients (i.e. reassessed inert ingredients) will be considered for organic designation at this time. (Ingredients approved by 7 CFR part 205 excepted.)
- NOP applicants should be aware that the tolerance exemptions for the following ingredients still found in the above List 4 have since been revoked and are no longer approved for use in pesticide products under USDA's NOP: manganous oxide; polyglyceryl phthalate ester of coconut oil fatty acid; coumarone - indene resin; pentaerythritol monostearate; pentaerythritol tetrastearate; acrylic acid methyl ester, polymer with acrylonitrile and 1,3-butadiene (tolerance exemption is called "Nitrile rubber modified acrylonitrile methylacrylate [CAS Reg. No. 27012-62-0] conforming to 21 CFR 177.1480"); sodium fluoride; and acetylated lanolin alcohol.
- For food uses, NOP applicants should cross-check their inert ingredients against the electronic Code of Federal Regulations (e-CFR) (40 CFR Part 180) to assure that their proposed uses remain covered by an appropriate tolerance exemption. The e-CFR can be found through the following link: <http://www.gpoaccess.gov/ecfr/> (Select Title 40, Volume 23 (parts 150-189), and then part 180. The majority of inert ingredient tolerance exemptions are found in 180.910 – 160.)
- NOP applicants are responsible for providing sufficient information on their inert ingredients for EPA to make an NOP determination. Simply noting an ingredient as List 4 is often not sufficient. The NOP has many additional requirements for ingredients, which are intended to assure organic character of the formulation. EPA suggests applicants submit Manufacturing Process data for their product and technical data sheets and MSDS for their inert ingredients.

- NOP applicants using proprietary blends in their formulations should check with their suppliers to assure that all the constituent ingredients in their blend can be found on this posted List 4, dated August 2004. The owner of the propriety blend must submit to EPA a complete description of the blend's composition (trade name, chemical names, CAS Reg. No.s, and amount of each component the total of which must equal 100%).
- EPA's National Organic Program Contact Information:
Chris Pfeifer
Organic Labeling Liaison,
Biopesticides and Pollution Prevention Division, EPA
Ph# 703-308-0031
Email: pfeifer.chris@epa.gov